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September 9, 2019

VIA Electronic Comment Filing System

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket No. 00-257: Notification of Acquisition of Customers

Dear Ms. Dortch:

Charter Fiberlink WA-CCVII, LLC ("Charter Fiberlink") and Spectrum Advanced Services, LLC ("Spectrum Advanced Services") (together, the "Charter Entities") hereby notify the Commission of their intent to acquire the customer base of Country Cable, LLC ("Country Cable") as described more fully below.

The Charter Entities do not believe that Section 64.1120(e) of the Commission's Rules, 47 CFR § 64.1120(e), applies to the acquisition because, although Charter Fiberlink is a telecommunications carrier, Country Cable provides interconnected Voice over Internet Protocol ("VoIP") service to the two (2) customers being acquired by the Charter Entities. Additionally, following the acquisition, Spectrum Advanced Services will provide interconnected VoIP service to those customers. The Commission has not determined whether interconnected VoIP services are telecommunications services, nor has it yet ruled that its carrier change rules apply to interconnected VoIP services.¹ Both the Wireline Competition Bureau and the International Bureau Policy Division's Staff have previously advised the Charter Entities and their affiliates in the context of similar transactions that the Commission's consent pursuant to Section 214 of the Communications Act is not required for the acquisition of interconnected VoIP customers and/or

¹ See *In the Matter of Mediacom Complaint Regarding Unauthorized Change of Subscriber's Telecommunications Carrier*, IC No. 08-S0294769, Order on Reconsideration, DA 09-1093, 24 FCC Rcd 5697 (Adopted May 18, 2009, Released May 19, 2009) (citing generally 47 C.F.R. §§ 64.1100(b), (d) and citing *In the Matter of IP-Enabled Services*, WC Docket No. 04-36, Notice of Proposed Rulemaking, 19 FCC Rcd 4863, 4910-11, paras. 71-72 (2004), in which the Commission has sought comment on whether it is necessary to extend slamming regulations to VoIP or other IP-enabled service providers.).

assets related thereto.² Nonetheless, the Charter Entities have complied with the customer notification requirements set forth in Section 64.1120(e) out of an abundance of caution.

Names of the Parties to the Transaction: The parties to the transaction include Country Cable, the transferor, and Charter Fiberlink and Spectrum Advanced Services, the transferees.

Types of Telecommunications Services Provided to Affected Customers: Country Cable provides interconnected VoIP services to the two (2) affected customers in the State of Washington. Country Cable will transfer the customers to the Charter Entities.

Date of Transfer: The parties anticipate that the affected customers will be transferred to Spectrum Advanced Services on or about October 9, 2019.

Certification of Compliance: The Charter Entities certify that they have complied with the Commission's requirement to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

Copy of Notice Sent to Affected Subscribers: Filed herewith is a sample of the customer notification letter that was mailed on September 9, 2019.

Please direct any questions concerning this notification to the undersigned.

Very truly yours,



Charles A. Hudak
Counsel for Charter Fiberlink WA-CCVII, LLC
and Spectrum Advanced Services, LLC

Enclosures

cc: Michael R. Moore, GVP Law – Telephone Regulatory
Charter Communications, Inc.

² See *Application of Charter Communications Entertainment II, LLC, CCO Fiberlink, LLC, Charter Fiberlink CA-CCO, LLC, WaveDivision VI, LLC and Wave Broadband, LLC for Authority to Transfer Certain Assets*, WC Docket No. 07-179, Letter from Charles V. Gerkin, Jr., Friend, Hudak & Harris, LLP to Marlene H. Dortch, Secretary, Federal Communications Commission (filed Aug. 24, 2007); *Application of Charter Communications Entertainment II, LLC, CCO Fiberlink, LLC, Charter Fiberlink CA-CCO, LLC, WaveDivision VI, LLC and Wave Broadband, LLC for Authority to Transfer Certain Assets*, WC Docket No. 07-179, *Notice Of Termination Of Domestic Section 214 Application Proceeding*, DA 07-3788, 22 FCC Rcd 16205 (August 29, 2007); see also *Application of Charter Fiberlink – Georgia, LLC and James Cable, LLC for Authority to Transfer Certain Assets*, WC Docket No. 00-257, Letter from Charles A. Hudak, Friend, Hudak & Harris, LLP to Marlene H. Dortch, Secretary, Federal Communications Commission (filed Mar. 20, 2012).

EXHIBIT A

CERTIFICATION

On behalf of Charter Fiberlink WA-CCVII, LLC and Spectrum Advanced Services, LLC (together, the "Charter Entities"), and in accordance with Section 64.1120(e) of the Commission's Rules, 47 CFR § 64.1120(e), I hereby certify under penalty of perjury that I have read the foregoing notification and that the statements contained therein are true, complete and correct to the best of my knowledge, information and belief. I further certify that, with respect to the transfer to the Charter Entities of the affected customers of Country Cable, LLC, the Charter Entities have complied with the Commission's requirements to provide advance customer notice in accordance with Section 64.1120(e)(3), with the obligations specified in that notice.

By:



Michael R. Moore

Title: Group VP Law – Telephone Regulatory

Date:

9-9-19

EXHIBIT B

CUSTOMER NOTIFICATION LETTER



ACTION REQUIRED

Call 1-833-542-9899 before 10/9/2019

September 9, 2019

<Variable 2>
Street Address
City, State, Zip

Dear Valued Customer,

Great news! Spectrum has completed the transaction with Country Cable, and your home will soon have access to Spectrum’s advanced TV, Internet and Voice services.

As part of our effort to transition you, we are proactively switching your services over on **10/9/19**.

What You Need to Do

- On or after 10/9/19, the existing equipment in your home must be replaced with Spectrum equipment, including a Spectrum Receiver on each TV in your home. To help with this transition, we will supply you with <Variable 3> at no cost for 12 months.*
 - Note, you will need to keep your existing equipment until your Country Cable services are migrated to Spectrum services. This way you do not lose access to your current services.

<p>Call to Schedule an Appointment</p> <p>Call 1-833-542-9899 to schedule a technician to replace your existing equipment.</p>	<p>Visit Your Local Spectrum Store</p> <p>Get product information and schedule an installation appointment.</p> <p>Visit your store on 9/25/19 & 9/26/19: Coulee Dam City Hall, 300 Lincoln Avenue, Coulee Dam, WA 99116</p> <p>Between 8:00am – 4:30pm</p>
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Important Service Changes

- TV Service**
 - Your current TV package will be discontinued and migrated to **Spectrum TV®** <Variable 4>. This offers you a more expansive channel offering, including more FREE HD and more On Demand choices including FREE Primetime On Demand. For your convenience, find your new channel lineup enclosed.
 - Any current DVR recordings or scheduled recordings that you have set-up will be lost. Once you receive your new Spectrum equipment, you can set-up your DVR recordings.
- Internet Service**
 - Get ready to surf faster – your download speeds will increase from <Variable 5> up to 100 Mbps.
 - If you currently have a Couleedam.net email account, on 1/9/2020 your email account will be discontinued. We will be sending you additional information that will detail the next steps to set up your new Spectrum.net account.
 - You will lose any saved email. We recommend you **make a note of important messages** and secure them on a physical drive before the transition.
- Phone/Voice Service**
 - For your convenience, your current telephone number will be transferred to your new Spectrum Voice® service.
 - You will experience a phone service interruption on **10/9/19** until your service has migrated to Spectrum Voice. **During this process, you will not have the ability to dial 911 in the event of an emergency.** Be sure to make alternative arrangements during this time, such as making sure your cell phone is charged.
 - You will lose your saved voicemails. We recommend you go through your voicemail and **make a note or recording of important messages.** You will also need to rerecord your voicemail greeting after the migration to Spectrum services is complete.

Important Billing Changes

You will be receiving a new account number. Your new account number can be found in the upper left corner of your next monthly bill statement. Keep your new account number handy for future reference and be sure to update your new account number with your financial institution to ensure payment processing.

Effective with your next billing statement, your new monthly rate will be:

\$<Variable 7> for Spectrum TV® <Variable 4>, \$<Variable 8> for Spectrum Internet®, \$<Variable 9> for Spectrum Voice® as well as applicable taxes and fees. **Plus, for the next 12 months, you will receive a \$15 monthly credit.** Standard rates apply after year 1 for all services.

Other Changes to Your Service

New Security Code

- Your Security Code is necessary for privacy and is randomly generated. This appears in the upper left corner of your statement each month.

Credit Card Information

- If Country Cable currently has your credit card on file, this information is no longer valid. Please watch your mail as we will be sending you a monthly statement with payment instructions.

Username

- You will need to register for a new Username. You can visit Spectrum.net/newaccount and follow the on screen instructions. The process should only take a few minutes.

If you have any questions about these changes or your new services, call a Spectrum Specialist at **1-833-542-9899**. To see all that your new Spectrum services have to offer, please visit Spectrum.com.

Be on the lookout for additional communications as we continue to improve your service.

Sincerely,



Kathleen Griffin
VP, Marketing Communications

Important Information about your Phone Service

If Country Cable, LLC currently provides your telephone service, this letter is to inform you that Charter Fiberlink WA-CCVII, and Spectrum Advanced Services, LLC (collectively, "Charter") have agreed to acquire the assets of Country Cable. Accordingly, Charter will begin providing telephone service to customers currently being served by Country Cable.

Subject to obtaining any state and federal regulatory approvals that may be required, **we anticipate that the transition to Charter will occur on or about 10/9/2019**. Unless you have begun using a service provider other than Country Cable prior to this date, Country Cable will transition your current telephone service to Spectrum Voice® service.

The terms and conditions for the Spectrum Voice service to which your current telephone service will be transitioned will remain the same at the time of this change, and your rates for the Spectrum Voice service will be less than or equal to your current telephone service rates. Notice of any future changes in rates, terms and conditions of Spectrum Voice service will be provided to you as required by law.

You have the right to subscribe to telephone service from any service provider that you wish. This decision is entirely up to you, and you may choose to switch to another provider either before or after the transfer to Charter occurs. You will not be charged any fees for the transfer to Charter, and Charter will be responsible for any carrier change fees that might apply as a result of such transfer. However, selecting a provider other than Charter may result in a charge being imposed for which Charter will not be responsible.

If you have placed a preferred carrier "freeze" on your telephone services to prevent their unauthorized transfer to another service provider, FCC rules require that the freeze be lifted at the time of the transfer to Charter. At your request, Spectrum Voice can reestablish preferred carrier "freeze" protection for your account after the transfer; just contact us at 1-833-542-9899. If you do not have a "freeze" on your account, no action is required. Charter values your continued business and will gladly respond to any questions you may have about Spectrum Voice service either prior to or during the change.

Until the actual transfer date, Country Cable will continue to be responsible for all customer service and billing issues. You should contact Country Cable with any questions, complaints or other customer service inquiries you may have prior to the transfer. After the transfer date, you should refer your questions to Charter.

If you have any questions regarding the transfer to Charter, please contact a Spectrum representative at 1-833-542-9899.

Charter Fiberlink WA-CCVII, LLC
Spectrum Advanced Services, LLC